

Attorneys for Defendant  
WALGREEN CO.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Case No. 5:12-CV-06269-HRL

**STIPULATION AND ~~[PROPOSED]~~ ORDER  
REGARDING EXPERT DISCOVERY**

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## I. STIPULATION

The parties hereto, through their undersigned counsel of record, hereby stipulate as follows:

1. The current cut-off date for expert discovery is November 22, 2013;
2. Walgreen Co. (“Walgreens”) is in the process of preparing, and will be filing, a motion for summary judgment and/or summary adjudication;
3. In order to proceed efficiently and cost-effectively with litigation, the parties agree that the depositions of Plaintiff’s retained and non-retained experts, Ann Marie Noel and Dr. Shabi Kahn, may take place, if necessary, after the Court rules on Walgreen’s motion for summary judgment and/or summary adjudication.

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